

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 20-cv-13293
	)	
INTERNATIONAL UNION, UNITED	)	
AUTOMOBILE, AEROSPACE, AND	)	
AGRICULTURAL IMPLEMENT WORKERS	)	
OF AMERICA,	)	Hon. David M. Lawson
	)	
Defendant.	)	

**DEFENDANT UAW’S UNOPPOSED MOTION FOR  
LEAVE TO FILE EXHIBIT IN SUPPORT OF ITS RESPONSE TO  
MOTION OF UAWD AND SCOTT HOULDIESON FOR LEAVE TO INTERVENE**

Defendant International Union, United Automobile, Aerospace, and Agricultural Implement Workers of America (“UAW”), by its attorneys, Terence H. Campbell and Eric S. Pruitt of Cotsirilos, Tighe, Streicker, Poulos & Campbell, respectfully moves the Court for leave to file the attached exhibit in support of the UAW’s response in opposition to the motion of UAWD and Scott Houldieson (collectively, “Movants”) for leave to intervene in this matter.

1. On March 8, 2021, the UAW filed its response in opposition to Movants’ request for leave to intervene in this matter. In its response, the UAW included a hyperlink citation to a news article. Dkt.#16 at 7, n.1, PageID.229. The UAW did not, however, attach a PDF copy of the article referenced by the hyperlink citation. To have the referenced article made part of the record in compliance with Electronic Filing Policies and Procedures, R5(e), the UAW is hereby requesting leave to submit the referenced article to the Court and have it made part of the record. See Exhibit A (Tom Krisher, *UAW Agrees to Monitor, Voting Changes after Corruption Probe*,

Associated Press, Dec. 14, 2020).

2. Pursuant to E.D. Mich. Local Rule 7.1, counsel for the UAW has conferred with counsel for Movants and the United States. Neither party objects to the UAW's motion for leave to submit the attached exhibit in support of its response brief.

### **CONCLUSION**

For the reasons set forth herein, we respectfully request that the Court grant this motion and make the attached exhibit part of the record in support of the UAW's response to Movant's request to intervene in this case.

Respectfully submitted,

/s/ Eric S. Pruitt

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Workers of America*

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**BRIEF IN SUPPORT OF DEFENDANT UAW’S UNOPPOSED  
MOTION FOR LEAVE TO FILE EXHIBIT IN SUPPORT OF ITS RESPONSE TO  
MOTION OF UAWD AND SCOTT HOULDIESON FOR LEAVE TO INTERVENE**

**ISSUE PRESENTED**

Whether Defendant International Union, United Automobile, Aerospace, and Agricultural Implement Workers of America (“UAW”) should be granted leave to file the attached exhibit in support of the UAW’s response in opposition to the motion of UAWD and Scott Houldieson for leave to intervene in this matter.

**BRIEF IN SUPPORT OF UAW'S  
UNOPPOSED MOTION FOR LEAVE TO FILE EXHIBIT**

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Respectfully submitted,

/s/ Eric S. Pruitt

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